

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:

**Taylor Madison Francois Bodine
*aka Taylor Francois-Bodine
aka Taylor Bodine
aka Francois Bodine Consulting,***

Debtor.

Case No. 21-11238-KHK

Chapter 7

**UNITED STATES TRUSTEE'S MOTION TO EXTEND TIME
TO FILE A COMPLAINT OBJECTING TO DISCHARGE OF THE DEBTOR**

Comes Now, John P. Fitzgerald, III, Acting United States Trustee for Region Four, and, pursuant to Bankruptcy Rules 4004(b) and 1017(e), hereby requests an extension of time to file a complaint objecting to the discharge of the debtor pursuant to 11 U.S.C. § 727. In support of his motion the Acting United States Trustee states the following:

1. The Debtor commenced this proceeding by filing a petition for relief under Chapter 7 of the Bankruptcy Code on July 12, 2021. *See Docket Entry #1.*
2. Along with the voluntary petition, the Debtor filed her Individual Schedule(s) and/or Statement(s), Lists. The Debtor signed each of the documents under penalty of perjury. *See Id at 6,37,44,46,50.*
3. Kevin R. McCarthy was appointed the interim chapter 7 trustee and a 341(a) Meeting of creditors was schedule for and held on August 18, 2021. He remains the chapter 7 trustee. *See Docket #3.*
4. Pursuant to Bankruptcy Rule 4004(a), the last day for filing a complaint objecting to

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the discharge of the Debtor is **October 18, 2021**. *See Docket entry #3.*

5. Bankruptcy Rule 4004(b) provides that the time period for filing a complaint objecting to discharge can be extended for cause upon the motion of the United States Trustee.

6. On October 1, 2021, two (2) complaints seeking a determination that the indebtedness the Debtor owes is non-dischargeable in accordance with 11 U.S.C. § 523(a) were filed (“Complaints”). *See Hay v. Francois Bodine, Adv. Proc. No. 21-01056-KHK and Gleit v. Francois Bodine, Adv. Proc. No. Docket No. 21-01057-KHK.*

7. The United States Trustee requests additional time so that he can complete his investigation of the circumstances in this case, which will enable him to determine whether filing a complaint objecting to discharge is warranted in this case.

8. Extensions of time for objecting to discharge should be granted liberally absent a clear showing of bad faith on the part of the party requesting the extension. *In re Kellogg*, 41 B.R. 836, 838 (Bankr. W.D. OK 1984).

9. In addition, the granting of the requested extension will not prejudice the debtor in any way and will not impede the efficient administration of the case. *In re Nobel*, 54 B.R. 458, 461 (Bankr. D. Col. 1985)(extension of time to object to debtor's discharge granted where extension requested by creditor was not made in bad faith, the delay as a result of the extension is insubstantial and would not adversely affect the administration of the case, and the extension would not result in any prejudice to the debtor).

10. The United States Trustee requests an extension of 90 days, for the United States Trustee to file a complaint objecting to the discharge of the Debtor pursuant to 11 U.S.C. § 727 which is **January 17, 2022**.

WHEREFORE, THE UNITED STATES TRUSTEE MOVES THE COURT TO:

1. Extend the time for the United States Trustee to file a complaint objecting to the

discharge of the Debtor to **Monday, January 17, 2022;**

2. Grant such further relief as the Court may deem just and fair.

October 15, 2021

JOHN P. FITZGERALD, III
ACTING U. S. TRUSTEE, REGION 4

By: /s/ Kristen S. Eustis
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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2021, I electronically filed the foregoing motion to extend time along with the Notice of Motion and Proposed Order with the Clerk of the Court and transmitted a true and correct copy of said documents electronically through the electronic case filing system or by first class United States mail, postage prepaid to the following:

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Chapter 7 Trustee

/s/ Paula Blades
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